

E FILED ON 06/17/2020
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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:)	BANKRUPTCY NUMBER:
)	BK-S- 20-12890-MKN
PLAYERS NETWORK,)	Chapter 11
)	
Debtor-In-Possession.)	Date: N/A
)	Time: N/A

**EX PARTE MOTION FOR PROCEDURES ORDER RE: FIXING OF DEADLINES AND
PROCEDURES IN SUBCHAPTER V CASE RELATING TO PROPOSED CHAPTER 11
PLAN OF REORGANIZATION**

Comes now, the Debtor above-named, by and through its attorney, THOMAS E. CROWE, ESQ., and moves this Court for an ex parte order fixing dates and deadlines relating to the Debtor's Chapter 11 Plan of Reorganization (the "Plan") as set forth in the points and authorities attached hereto.

DATED this 17th day of June, 2020.

THOMAS E. CROWE PROFESSIONAL
LAW CORPORATION
By /s/ THOMAS E. CROWE
THOMAS E. CROWE, ESQ.
2830 S. Jones Blvd. #3
Las Vegas, Nevada 89146
Attorney for Debtor

POINTS AND AUTHORITIES

1. On June 17, 2020 (the “Petition Date”), the Debtor filed its voluntary petition for relief under chapter 11 and indicated that it chose to proceed under Subchapter V of title 11 of the Bankruptcy Code. The Debtor is authorized to operate its business and manage its property as a debtor in possession pursuant to sections 1184 of the Bankruptcy Code.

2. [Interim] Bankruptcy Rule 3017.2 allows the Court to fix the following dates in a chapter 11 case under Subchapter V of title 11 of the Bankruptcy Code: (a) fix a time within which the holders of claims and interests may accept or reject a Plan; (b) fix a date on which an equity security holder or creditor whose claim is based on a security must be the holder of record of the security in order to be eligible to accept or reject the plan; (c) fix a date for the hearing on confirmation; and (d) fix a date for transmission of the plan, notice of the time within which the holders of claims and interests may accept or reject the plan, and notice of the time within which the holders of claims and interests may accept or reject the plan, and notice of the date for the hearing on confirmation. Additionally, Local Rule 3017(a) allows the Court to approve the entry of an order implementing expedited confirmation procedures in chapter 11 cases.

SOLICITATION PACKAGES AND DISTRIBUTION PROCEDURES

3. Bankruptcy Rule 3017(d) sets forth the materials that must be proved to holders of claims and equity interests for the purpose of soliciting their votes and providing adequate notice of the hearing on confirmation of a chapter 11 plan. As provided in the Plan, Class four is unimpaired, and therefore solicitation to these classes of claims is not required and they are deemed to accept the Plan, however, Class three is impaired, and therefore solicitation of this Class is required. Following the entry of order approving this Motion, the

Debtor proposes to distribute packages (the “Plan Packages”) consisting of: (i) the Plan, including all exhibits thereto; (ii) the order granting this Motion in the form attached as **Exhibit 1** (the “Procedures Order”); (iii) the confirmation hearing notice substantially in the form attached as **Exhibit 2** (the “Hearing Notice”); and (iv) an appropriate form of ballot as hereinafter described.

FORM OF BALLOT; BALLOT DEADLINE; BALLOT SUMMARY

4. Pursuant to the Plan, there are two classes of claims voting on the Plan, and thus those classes will receive ballots. The Debtor’s form of ballot will be consistent with the Official Form 314. Pursuant to Bankruptcy Rule 3017.2(a), the Debtor requests that the Court set August 11, 2020 (the “Ballot Deadline”) as the deadline within which the holders or claims and interests may accept or reject the Plan, such that the ballots are **actually received** by the Debtor’s counsel by that deadline. The Debtor proposes to file a Certification of Acceptance and Rejection of Chapter 11 Plan (the “Ballot Summary”) by August 18, 2020.

CONFIRMATION HEARING AND BREIFING DEADLINES

5. In accordance with Bankruptcy Rule 3017.2(c), the Debtor requests that a hearing of confirmation of the Plan (the “Confirmation Hearing”) be scheduled on August 25, 2020. The Confirmation Hearing may be continued from time to time by the Bankruptcy Court or by the Debtor without further notice other than adjournments announced in open court at the hearing or any subsequent adjourned confirmation hearing, and the Plan may be modified pursuant to section 1193 of the Bankruptcy Code and its terms, prior to , during or as a result of the Confirmation Hearing, in each case without further notice to parties-in-interest. The proposed timing for the Confirmation Hearing is in compliance with the

Bankruptcy Code, the Bankruptcy Rules, and the Local Rules, and will enable Debtor to pursue confirmation of the Plan in a timely fashion.

6. The Debtor requests that the Court require any and all objections to confirmation of the Debtor's Plan (collectively, the "Objections"), as well as any declarations or affidavits in support of such Objections, be filed by August 11, 2020 (the "Objection Deadline"), and that any replies thereto be required to be filed by August 18, 2020 (the "Reply Deadline"). Notwithstanding the foregoing, this will not alter any deadlines provided in the Court's Scheduling Order.

7. Further, pursuant to Bankruptcy Rule 3020(b)(1), the Debtor requests that the Court order that any creditor or party-in-interest who fails to object to confirmation of the Plan by the Objection Deadline, fails to file such objection in writing and otherwise in compliance with Local Rule 9014, and/or otherwise fails to timely serve such objection, shall be deemed to have waived any objection to confirmation of the Plan.

NOTICE OF THE CONFIRMATION HEARING

8. Bankruptcy Rules 2002(b) and (d) require not less than twenty-eight (28) days' notice to all creditors and equity security holders of the time fixed for filing objections and the hearing to consider confirmation of a Chapter 11 plan. In accordance with Bankruptcy Rules 2002 and 3017(d), Bankruptcy Rule 3017.2(d), and as set forth above, the Debtor proposed to provide to all creditors and parties in interest a copy of the Hearing Notice setting forth: (i) the Ballot Deadline; (ii) the Objection Deadline; and (iii) the time, date, and place for the Confirmation Hearing. As also set forth above, such notice will be sent contemporaneously with the Plan Packages. The Debtor will transmit all of the foregoing within five (5) business days of entry of the Order approving this Motion. The debtor

submits that the foregoing procedures will provide adequate notice of the Confirmation Hearing and, accordingly, request that the Bankruptcy Court approve such notice as adequate.

CONCLUSION

9. WHEREFORE, the Debtor requests that the Court enter the Procedures Order thereby determining and ordering, *inter alia*, as follows:

1. The Hearing Notice for the Confirmation Hearing on the Plan is approved, and the Debtor is authorized to distribute the Plan Packages.
2. The following deadlines and dates are scheduled:
 - a. Objection Deadline: August 11, 2020 is fixed as the last day for filing and serving written Objections to confirmation of the Plan, as well as any affidavits or declaration s in support of such Objections;
 - b. Ballot Deadline: August 11, 2020 is fixed as the last day for the Debtor's counsel to actually receive any completed ballots for voting on the Debtor's Plan;
 - c. Reply Deadline: August 18, 2020 is fixed as the deadline for the Debtor to file a brief in support of confirmation, a reply to any timely filed Objections to confirmation, and any declaration(s) in support of the confirmation of the Plan;
 - d. Ballot Summary Deadline: August 18, 2020 is fixed as the deadline for the Debtor's filing of the Ballot Summary; and
 - e. Confirmation Hearing: August 25, 2020 at 9:30 a.m. is fixed as the date and time for the Confirmation Hearing on the Plan.

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3. Granting the Debtor such other and further relief as is just and proper.

DATED this 17th day of June, 2020.

THOMAS E. CROWE PROFESSIONAL
LAW CORPORATION

By /s/ THOMAS E. CROWE
THOMAS E. CROWE, ESQ.
2830 S. Jones Blvd. #3
Las Vegas, NV 89146
Attorney for Debtor

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Exhibit 1

E FILED ON 06/17/2020
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Nevada State Bar no. 3048

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

* * * * *

In re:)	BANKRUPTCY NUMBER:
)	BK-S-20-12890-MKN
PLAYERS NETWORK,)	Chapter 11
)	
Debtor-In-Possession.)	Date: N/A
)	Time: N/A

**ORDER RE: EX PARTE MOTION FOR PROCEDURES ORDER RE: FIXING OF
DEADLINES AND PROCEDURES IN SUBCHAPTER V CASE RELATING TO
PROPOSED CHAPTER 11 PLAN OF REORGANIZATION**

Upon Application of Counsel herein, and for good cause appearing,

WHEREFORE, the Debtor requests that the Court enter the Procedures Order
thereby determining and ordering, *inter alia*, as follows:

THAT The Hearing Notice for the Confirmation Hearing on the Plan is
approved, and the Debtor is authorized to distribute the Plan Packages.

The following deadlines and dates are scheduled:

- a. Objection Deadline: August 11, 2020 is fixed as the last day for filing and serving written Objections to confirmation of the Plan, as well as any affidavits or declaration s in support of such Objections;
- b. Ballot Deadline: August 11, 2020 is fixed as the last day for the Debtor's counsel to actually receive any completed ballots for voting on the Debtor's Plan;
- c. Reply Deadline: August 18, 2020 is fixed as the deadline for the Debtor to file a brief in support of confirmation, a reply to any timely filed Objections to confirmation, and any declaration(s) in support of the confirmation of the Plan;
- d. Ballot Summary Deadline: August 18, 2020 is fixed as the deadline for the Debtor's filing of the Ballot Summary; and
- e. Confirmation Hearing: August 25, 2020 at 9:30 a.m. is fixed as the date and time for the Confirmation Hearing on the Plan.

THAT the court grant the Debtor such other and further relief as is just and proper.

Respectfully Submitted by:

THOMAS E. CROWE PROFESSIONAL
LAW CORPORATION

/s/ THOMAS E. CROWE
THOMAS E. CROWE, ESQ.
State Bar no. 3048
2830 S. Jones Blvd., Ste. 3
Las Vegas, NV 89146
Attorney for Debtor-in-possession

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Exhibit 2

E FILED ON 06/17/2020
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Attorney for Debtor

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:)	BANKRUPTCY NUMBER:
)	BK-S- 20-12890-MKN
PLAYERS NETWORK,)	Chapter 11
)	
Debtor-In-Possession.)	Date: August 25, 2020
)	Time: 9:30 a.m.

**NOTICE OF HEARING RE: PLAN OF REORGANIZATION FOR SMALL BUSINESS
UNDER CHAPTER 11**

NOTICE IS HEREBY GIVEN that a hearing will be held on Debtor's Plan of Reorganization for Small Business Under Chapter 11, filed herein by THOMAS E. CROWE, ESQ.. Any opposition must be filed pursuant to the order transmitted herewith.

NOTICE IS FURTHER GIVEN that August 11, 2020 is fixed as the last day for filing written acceptances or rejections (Ballots) of the Plan referenced above.

NOTICE IS FURTHER GIVEN THAT August 11, 2020 is fixed as the last day for filing and serving pursuant to Fed. R. Bankr. P. 3020(b)(1) written objections to confirmation of the Plan.

If you object to the relief requested, you *must* file a **WRITTEN** response to this pleading with the court. You *must* also serve your written response on the person who sent you this notice.

If you do not file a written response with the court, or if you do not serve your written response on the person who sent you this notice, then:

- The court may *refuse to allow you to speak* at the scheduled hearing; and
- The court may *rule against you* without formally calling the matter at the hearing.

NOTICE IS FURTHER GIVEN that the hearing on said Confirmation will be held before a United States Bankruptcy Judge, in the Foley Federal Building, 300 Las Vegas Blvd. South, Bankruptcy Courtroom No. 2, Las Vegas, Nevada 89101 on August 25, 2020, at the hour of 9:30 a.m..

DATED this 17th day of June, 2020.

THOMAS E. CROWE PROFESSIONAL
LAW CORPORATION

By /s/ THOMAS E. CROWE
THOMAS E. CROWE, ESQ.
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